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April 21, 2025

BY ECF

Hon. Gary R. Brown
United States District Judge
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

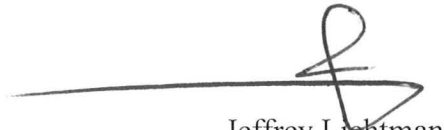
Re: United States v. Jacob Walden, 24 CR 521 (GRB)

Dear Judge Brown:

I am writing on behalf of defendant Jacob Walden to respectfully request permission to file an oversized memorandum of law with respect to our forthcoming motion to suppress the search and seizure of Mr. Walden's cellphone in April 2024 as he departed the United States. I anticipate that we will require approximately 35 pages for our memorandum of law, as the search and seizure of a defendant's cellphone as he departs the United States remains a novel area of law. The government, by AUSA Leonid Sandlar, has no objection to this request.

Thank you for the Court's consideration of this application; I remain available for a conference on the matter should Your Honor deem it necessary.

Respectfully submitted,



Jeffrey Lichtman

cc: Leonid Sandlar, Esq.
Assistant United States Attorney (by ECF)